

D & B Broadcasting, LLC
3105 S. Martin Luther King Jr., Blvd., PMB 376
Lansing, Michigan 48910-2939

David C. Schaberg, VP
Office: 517-394-1036

WSRQ (FM), 100.1
Bear Lake, Michigan
WSRI (FM), 92.1
Beulah, Michigan

DOCKET FILE COPY ORIGINAL

September 9, 2000

Mass Media Bureau
FM Branch
Federal Communications Commission
Washington, DC 20554

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SEP 12 2000

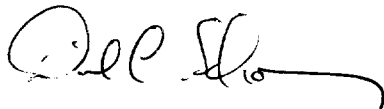
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00-141

To: The Secretary

WSRQ and WSRI, both of which have been silent since October 28, 1999, have returned to the air effective this date.

Sincerely yours,


David C. Schaberg, VP

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The Commission has proposed the allocation of channel 280A to Pentwater as its third broadcast service. Pentwater, already has another class A allocation and a class C3 allocation. Pentwater is a village with estimated population of 1082 persons and the county of Oceana where Pentwater is located has a population estimated at 23,107. In addition to the two Pentwater signals, there is another class C station located at Hart, MI, (approximately 8 miles southeast of Pentwater) giving the county three full-time local signals.

Further, the petitioner, Mr. Zack, has already proposed another new channel (242A) at Ludington, MI, a larger town just 10 miles North of Pentwater. If he were to allocate both channels and be successful in his application for both, he would effectively only be giving the area one new source of coverage because both stations will cover essentially the same geographical area.

Therefore, to more efficiently utilize the spectrum and to provide the best possible allocation of channels among the various communities, I counter-propose channel 280A to Barryton, MI, as its first local service.

Barryton is a town of 449 people in Mecosta county that meets the criteria which the Commission has accepted as the definition of a "community" (see Walhalla, MI).

Mecosta county has three full-time stations (2 FM and one AM) all located in Big Rapids on the western side of the county.

The Barryton area has no local service and can only sporadically receive the AM station during the daytime and not during night directional operation, plus the class A FM station is marginal while the class C3 station is only slightly better. None of the stations puts a 60dbu signal over Barryton or any of the eastern portions of Mecosta county. Further, the county has a permanent population estimated at 37,514 of which nearly 26,000 live outside of Big Rapids (more than the total in Oceana county).

The inclusion of this channel at Barryton would improve the available broadcast reception and would provide the Eastern portion of Mecosta county with a solid, first service.

I would expect to be one of the applicants for the channel should it be allotted, as there surely would be a number of persons interested in providing this needed service.

A study of the Commission's database for interference shows that channel 280A may be allocated at $43^{\circ} 40' 37'' \text{ N} \times 85^{\circ} 11' 27'' \text{ W}$

The proposed site is Southwest of Barryton in a hilly area which provides good line-of-sight for coverage of the town and the site makes channel 280A unavailable for allocation at both Barryton and Pentwater.

CH	CALL SIGN	REQUIRED	ACTUAL	MARGIN
277B	WKFR	69.0	147.3	78.3
278C	WTCM	95.0	95.7	1.0
279C2	Harbor Beach, MI	106.0	181.4	75.4
280C2	WCWM	166.0	203.2	37.2
280A	WRSR	115.0	127.6	8.2
281A	Pinconning, MI	72.0	105.2	33.2
281B	WVGR	113.0	113.0	0.0
282A	WCZY	31.0	31.0	0.0
283A	Multiple Apps.	31.0	123.2+	92.2
283B	WSNX	69.0	85.8	16.8
283A	WMJA	31.0	107.2	76.2

I.F.

227C2 WKQZ

15.0

90.4

75.4

{+ Used Closest Application to the proposed site)

To review, Oceana county (where Pentwater is located) has a class C, a class C3 and a class A station allocated to it covering a population of approximately 23,107 persons. Mecosta county (where Barryton is located) has an AM, a class A and a class C3 station covering a population of 37,514, a substantial number of which have no local service from within the county.

Therefore, as a counter-proposal in this matter, it is requested that the Commission allocate Channel 280A to Barryton as its first local service in lieu of assigning it to Pentwater as its third local service.

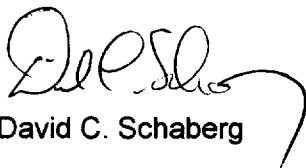
As proposed in MM Doc. 00-141:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Pentwater, Michigan	231C3, 274A	231C3, 274A, 280A

As counter-proposed herein:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Barryton, Michigan	None	280A
Pentwater, Michigan (unchanged)	231C3, 274A	231C3, 274A

Respectfully submitted,



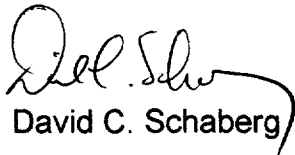
David C. Schaberg

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Certification of Service

I, David C. Schaberg, have this 8th day of September, 2000, served upon the counsel for the petitioner via US Mail, First Class, postage prepaid, a copy of the foregoing Comments and Counter-proposal.

Sent To: Robert L. Olender
Koerner & Olender, P.C.
5809 Nicholson Lane, Suite 124
N. Bethesda, MD 20852


David C. Schaberg